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9 *Attorneys for Defendant*  
10 *Google Inc.*

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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:  
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

DECLARATION OF ANNE M. SELIN  
IN SUPPORT OF DEFENDANT  
GOOGLE INC.'S RENEWED  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PURSUANT TO  
FEBRUARY 28, 2013 SEALING ORDER

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21 I, Anne M. Selin, declare as follows:

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23 1. I am an attorney with the law firm of Mayer Brown LLP, counsel for Defendant  
24 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this  
25 Court. I submit this declaration in support of Defendant Google's Renewed Administrative  
26 Motion to File Under Seal that is being filed concurrently herewith. As an attorney involved in  
27 the defense of this action, unless otherwise stated, I have personal knowledge of the facts stated  
28 in this declaration and if called as a witness, I could and would competently testify to them.

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2           2.       I have read and reviewed the Declaration of Laszlo Bock filed on January 25,  
3 2013 (Dkt. 319-3), which describes the competitive harm that Google would suffer if the  
4 manner in which Bill Campbell has been, and continues to be, compensated for his work as a  
5 senior advisor to Google were made public.

6           3.       I also have read and reviewed Plaintiffs' and Google's papers relating to  
7 Plaintiffs' motion to compel that reference Mr. Campbell's relationship to Google. I understand  
8 that Google previously sought to seal information about the services Mr. Campbell provided to  
9 Google. On February 28, 2103, the Court denied the request to seal information about Mr.  
10 Campbell's "relationship to Google" but held that "parts of the documents properly may be  
11 sealed, such as Campbell's Social Security number" and the "amount and nature of his  
12 compensation." Dkt. 333 at 4-5. The Court held that Google could renew its motion to seal  
13 "with narrowly tailored" redactions of that information. *Id.* at 4.

14           4.       Google has identified and made specific and narrowly tailored redactions to the  
15 following documents that contain confidential and highly sensitive details about Mr. Campbell's  
16 compensation, as well as private and personal information such as his Social Security Number  
17 and home address: (1) the Declaration of William Campbell in Support of Google's Response to  
18 Plaintiffs' Motion to Compel, (2) Exhibit 1 to the Supplemental Declaration of Dean M. Harvey  
19 in Support of Plaintiffs' Motion to Compel, and (3) Google's Supplement Regarding Plaintiffs'  
20 Motion to Compel Production of Documents. Google's proposed redactions to the above-  
21 mentioned documents are attached to Defendants' renewed administrative motion to seal.

22           5.       I also understand that this Court granted Google's request to file under seal  
23 Exhibits E, K, L and M to the Declaration of Dean M. Harvey in their entirety, as well as  
24 portions of Exhibits D and J in redacted form. Dkt. 333 at 5. Accordingly, Google has identified  
25 and made specific and narrowly tailored redactions of those portions of the Motion to Compel  
26 that describe and reveal the information in those exhibits.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on March 12, 2013 in Palo Alto, California.

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